

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SUSAN SOLTANPOUR

Plaintiff(s),

Docket No:

-against-

MARGUERITE ENDRIZZI

Defendant(s).
-----X

VERIFIED
COMPLAINT

JURY TRIAL
DEMANDED

FILED
U.S. DISTRICT COURT
S.D. N.Y. W.B.
2007 NOV - 8 A 11:13

**07 CIV. 9886
JUDGE KARAS**

Plaintiff, Susan Soltanpour by her attorneys, Goldblatt & Associates, P.C. complaining of the defendant Marguerite Endrizzi allege upon information and belief as follows:

AS AND FOR A FIRST CAUSE OF ACTION

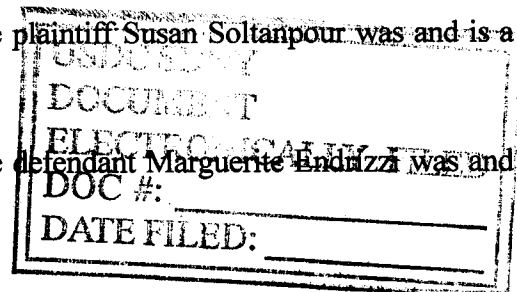
1. That prior to the service of this Summons and Verified Complaint and on the day of November, 2007, plaintiff purchased a docket number from the clerk of the United States District Court, Southern District of New York.

2: That the basis of jurisdiction is diversity pursuant to 28 USC 1332 & 1441.

3: Plaintiff requests a trial by jury.

4: That at all times hereinafter mentioned the plaintiff Susan Soltanpour was and is a resident of the State of New York.

5: That at all times hereinafter mentioned the defendant Marguerite Endrizzi was and is a resident of the State of Maine.



6. That at all times hereinafter mentioned the defendant Marguerite Endrizzi owned a certain motor vehicle bearing the State of Maine license plate number 71948.

7: That at all times hereinafter mentioned the defendant Marguerite Endrizzi maintained a certain motor vehicle bearing the State of Maine license plate number 71948.

8: That at all times hereinafter mentioned the defendant Marguerite Endrizzi was the lessee of a certain motor vehicle bearing the State of Maine license plate number 71948.

9: That at all times hereinafter mentioned the defendant Marguerite Endrizzi operated a certain motor vehicle bearing the State of Maine license plate number 71948.

10. That at all times hereinafter mentioned, the plaintiff operated a certain motor vehicle bearing New York State license plate number CKA4011.

11: That at all times hereinafter mentioned, Route 1 in Maine was and is a public thoroughfare in the County of Cumberland, State of Maine. .

12: That on or about February 18, 2005, the vehicle owned and operated by defendant Marguerite Endrizzi was in contact with the vehicle operated by plaintiff Susan Soltanpour on Route 1, Cumberland County, State of Maine.

13: That the defendant was careless, reckless, and negligent in the ownership, operation, maintenance and control of their motor vehicle under the circumstances then and there existing.

14: That the foregoing occurrence was caused solely and wholly as a result of the negligence of the defendant, without any negligence on the part of the plaintiff contributing thereto.

15: That as a result of the foregoing, plaintiff Susan Soltanpour suffered a serious injury as defined in Section 5102(d) of the Insurance Law of the State of New York.

16: That as a result of the foregoing, plaintiff Susan Soltanpour is entitled to recover for non-economic loss and for economic losses as are not included within the definition of basic economic loss as set forth in Section 5102(a) of the Insurance Law of the State of New York.

17: That as a result of the foregoing, plaintiff Susan Soltanpour sustained serious, severe and permanent personal injuries and was rendered sick, sore, lame, and disabled; plaintiff was

caused to suffer great pain, discomfort, and disability and, upon information and belief, will continue to suffer pain, discomfort, and disability in the future; plaintiff Susan Soltanpour was caused to undergo hospital and medical care, aid and attention, and upon information and belief, may continue to require to undergo medical care, aid and attention for a long period of time to come in the future; plaintiff was obliged to expend and incur large sums of monies for medical care, aid and attention and, upon information and belief, will continue to be obliged to expend and incur large sums of monies for future medical care, aid and attention; plaintiff was caused to become incapacitated from her usual vocation and avocation, and upon information and belief, may continue to be caused to remain away from her usual vocation and avocation for a long period of time to come in the future.

18: That as a result of the foregoing plaintiff has been damaged in a sum to be determined at time of trial

WHEREFORE, plaintiffs demand judgment against the defendant, on the first cause of action in a sum to be determined at time of trial together with the costs and disbursements of this action.

Dated: Mohegan Lake, New York
November 5, 2007

Yours etc.

Goldblatt & Associates, P.C.

By: 

Kenneth B. Goldblatt, Esq.

Attorneys for Plaintiff(s)

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